

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

No. 21-CR-00427 SMV/KRS

MARK MONDRAGON o/b/o  
D.M. a minor child,

Plaintiffs,

v.

RIO RANCHO PUBLIC SCHOOLS,  
BOARD OF EDUCATION and  
GEORGE ARCHULETA in his  
Individually and official capacity,

Defendants.

**DEPOSITION OF**

**DON MANGIN**

April 11, 2022

1:30 p.m.

500 4th Street, NW Suite 105  
Albuquerque, New Mexico 87102

PURSUANT TO THE NEW MEXICO RULES OF CIVIL PROCEDURE,  
this deposition was:

TAKEN BY: TODD J. BULLION  
ATTORNEY FOR PLAINTIFFS

REPORTED BY: EDWINA CASTILLO, CCR #407  
PAUL BACA COURT REPORTERS  
500 4th Street, NW Suite 105  
Albuquerque, New Mexico 87102

**EXHIBIT P**

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1 works. You're under oath today and your testimony  
2 could be used in court under certain  
3 circumstances. If you were say unavailable to  
4 testify at a -- at a trial, so everything you're  
5 saying is being typed down by the court reporter  
6 here, as are the questions I'm asking you. If I  
7 ask you a question that you do not understand,  
8 even if you are pretty sure that you understand,  
9 but you're not a hundred percent sure, please let  
10 me know. So that way we can talk about it, make  
11 sure that we're on the same page.

12 The reason I want to do that is if you  
13 are unsure what exactly what I'm asking, and you  
14 don't express that verbally, it will appear on the  
15 transcript, when the lawyers read it later, that  
16 you've understood what I was asking and provided  
17 an answer to it. So I want to make sure we're on  
18 the same page and that later on when we're looking  
19 the transcript over, we know that your answers are  
20 accurate and reliable. All right?

21 We can take a break at any time, should  
22 you want one, just let us know. And that's pretty  
23 much it.

24 Have you had any drugs or alcohol in the  
25 past two days?

Page 8

1 do you physically work out of a high school given  
2 the number of schools that you supervise security  
3 at?

4 A. Cleveland is the busiest.

5 Q. Okay.

6 A. Cleveland and Rio Rancho. So both of  
7 those security managers work out of the high  
8 schools.

9 Q. Okay. When you say "busiest," what do  
10 you mean?

11 A. We have a lot of, you know, activity  
12 going on. There's 20- -- almost 2600 students at  
13 the school, so there's constant security issues  
14 that we have to deal with.

15 Q. What issues do you typically deal with  
16 at the high school --

17 A. A lot of --

18 Q. -- at Cleveland?

19 A. -- a lot of vaping. That's probably the  
20 majority.

21 Q. Vaping?

22 A. Vaping, yeah, like nic- -- nicotine or  
23 THC.

24 Q. Okay. So when I was in high school, we  
25 didn't have vapes. I'm not overly familiar with

Page 7

1 A. I had a drink yesterday.

2 Q. Okay. You're not under the effects of  
3 alcohol right now, right?

4 A. No.

5 Q. Okay. And are there any reason you  
6 can't give truthful answers to questions today?

7 A. No.

8 Q. Okay. Well, let's get started then.

9 All right. So what's your job title?

10 A. I am a security manager for the Rio  
11 Rancho Public Schools.

12 Q. Okay. What are your job duties?

13 A. I'm security of the schools. I over --  
14 I supervise individuals that are at the high  
15 school, the middle schools, and also the  
16 elementary schools, and the preschool on the north  
17 side of Northern Boulevard in Rio Rancho.

18 Q. Okay. So that's -- is that four  
19 different schools or is it more?

20 A. No. It's the high school, two middle  
21 schools, five elementaries, and one preschool.

22 Q. Okay. So you've got your hands full.

23 Where do you physically work?

24 A. Out of Cleveland High School.

25 Q. Out of Cleveland High School, okay. Why

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1 them. Can you describe what a vape pen looks like  
2 to me, please?

3 A. It really looks like -- you remember the  
4 old thumb drives? It looks like one of these  
5 because it contains nicotine or THC.

6 Q. Like a USB thumb drive?

7 A. Basically, yeah, but they're a little  
8 bit longer and some -- there -- there's -- they  
9 come in many different variations.

10 Q. Okay. And you said that dealing with  
11 students vaping is probably your most frequently  
12 seen security issue?

13 A. Yes.

14 Q. Okay. And if you can help me ballpark  
15 what exactly that means. Is that more than 50  
16 percent of the issues you're dealing with relate  
17 to vaping?

18 A. Yes.

19 Q. Over and under 80 percent?

20 A. I'd say maybe 80.

21 Q. Right on. So eight of out ten security  
22 issues roughly deal with vaping?

23 A. Yes.

24 Q. At Cleveland High School?

25 A. Yes.

3 (Pages 6 to 9)

Page 18

1 **Q. Yes.**

2 A. -- it's my job to investigate it.

3 **Q. All right. And if you substantiated**  
4 **that it happened, what would happen?**

5 A. There would be disciplinary action.

6 **Q. What kind of disciplinary action?**

7 A. I -- I would have to go to HR. It would  
8 go to HR and they would deem what -- what will be  
9 done next.

10 **Q. Would you recommend a person be fired?**

11 A. That would be HR's decision. I don't --  
12 I don't fire.

13 **Q. Okay. Would you do anything in addition**  
14 **to what you've described or is that pretty much**  
15 **all you would do?**

16 A. I would investigate the situation and  
17 then report my findings to the HR department.

18 **Q. Okay. And you'd agree with me that**  
19 **guards shouldn't be conducting those kind of**  
20 **searches, watching students urinate?**

21 A. Conducting a search and watch them  
22 urinate?

23 **Q. Yeah, so let me -- let me rephrase, and**  
24 **thank you for expressing that you didn't quite**  
25 **understand that. So you'd agree with me that**

Page 20

1 have to go in and do searches of inmates' living  
2 areas, he might have been working in one of the  
3 facilities, you know, and that's how we'd run into  
4 people.

5 **Q. Okay. Were you guys friends,**  
6 **acquaintances?**

7 A. Acquaintances.

8 **Q. Who started working at Cleveland first?**  
9 **You or George?**

10 A. George.

11 **Q. George. Okay. When you came to work at**  
12 **Cleveland, did you get to know George better?**

13 A. I was a supervisor when I -- when I came  
14 on. I mean, I got to know all of my guys better.

15 **Q. Would you consider yourself to be**  
16 **friends with George?**

17 A. No.

18 **Q. Ever socialize outside of work?**

19 A. Like after a state championship when  
20 all -- all the school staff got together, that was  
21 about it. I've never been to his house or  
22 anything.

23 **Q. Ever play golf together?**

24 A. No.

25 **Q. Okay. You mentioned earlier -- well,**

Page 19

1 **guards should not be making efforts to observe**  
2 **students urinating as part of their job?**

3 A. Well, yeah, I would agree that that  
4 would be -- that wouldn't be the right thing to  
5 do.

6 **Q. Okay. How long have you worked with**  
7 **George Archuleta?**

8 A. George worked at -- well, I -- I came  
9 from corrections at first, but I didn't work with  
10 George in corrections. I knew of him. He worked  
11 for the schools maybe with me for seven years.

12 **Q. Okay. You said you knew of George when**  
13 **you were a corrections officer?**

14 A. I knew he was a corrections officer over  
15 at -- in Santa Fe.

16 **Q. And where were you a corrections**  
17 **officer?**

18 A. I was a canine officer in Santa Fe.

19 **Q. Were you employed by the department of**  
20 **corrections?**

21 A. Yes.

22 **Q. Okay. And so you hadn't worked with**  
23 **George, but you knew -- I'm -- I'm just trying to**  
24 **understand.**

25 A. I was a canine officer so like when I

Page 21

1 **actually, do you -- do you have video surveillance**  
2 **at Cleveland?**

3 A. Yes.

4 **Q. Can you describe the security setup to**  
5 **me?**

6 A. They're set up in all the hallways. We  
7 can't have them in the classrooms. We can't have  
8 them in the bathrooms. They're in the library.  
9 They're in the gym. They're in the field house.  
10 And I believe there's approximately 200 and -- 217  
11 cameras, maybe more now because we keep adding --  
12 oh, we also have in them in the parking lots.

13 **Q. Okay. And are the -- is the footage**  
14 **from that recorded and kept somewhere?**

15 A. Well, I don't know the life of the --  
16 the videos themselves. Each one of them differs  
17 because of the traffic. But if a -- if an  
18 incident has been asked to be recorded, we do  
19 record them and keep them.

20 **Q. All right. Explain that to me if**  
21 **you're -- if you're asked to keep a recording.**

22 A. If there's a fight that happened and  
23 they know that it's possibly going to go to a  
24 hearing, they'll say, "Do you have video footage  
25 of the fight? And if so, can you record it and

6 (Pages 18 to 21)

Page 22

1 then download and sent it to the hearing  
2 officers."

3 **Q. Okay. I think I understand. So unless**  
4 **you specifically receive a request to preserve**  
5 **video, it doesn't get kept?**

6 A. Sure.

7 **Q. How long can you go back and look for a**  
8 **video?**

9 A. Like I said, I couldn't tell you the  
10 answer. It -- it varies because some videos, like  
11 some cameras have a lot of more traffic so if the  
12 storage isn't going to be as long. And then you  
13 might have another one that there's hardly any  
14 traffic and the video will be around quite, you  
15 know, a little bit longer.

16 **Q. Okay. So are they motion-activated**  
17 **cameras?**

18 A. No, they're automatic.

19 **Q. So you're -- you're mentioning traffic.**

20 A. A lot of traffic. So like if I have one  
21 and let's just say in the first floor hallway on  
22 the east side, and there's -- there's constant  
23 traffic when the kids are between periods, are  
24 going from class to class, so that's a lot of  
25 camera footage. But you might have an area, say

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1 the baseball field that until baseball season, you  
2 really don't have any traffic.

3 **Q. So does the camera not record**  
4 **continually? It turns on at certain points in**  
5 **time.**

6 A. No, it's continual.

7 **Q. Okay. I know you said it varies from**  
8 **cameras to camera, but say someone asked you to**  
9 **find the video of a fight that happened like a**  
10 **week ago.**

11 A. There's a good possibility it -- it's  
12 there.

13 **Q. All right. How about two months ago?**

14 A. I couldn't tell you that.

15 **Q. How are searches of students documented**  
16 **at V. Sue Cleveland High School?**

17 A. They're gone -- they're put on an  
18 incident report.

19 **Q. Okay. And is that done each and every**  
20 **time there's a search of a student?**

21 A. Any time that an administrator requests  
22 one of my security individuals to conduct a  
23 search, they have to do an incident report. It's  
24 basic -- it's a basic information report.

25 **Q. Okay. And what about a security officer**

Page 24

1 **doing a search on their own volition without being**  
2 **requested by administration, do they make a report**  
3 **then?**

4 A. If they would do that on their own, but  
5 they don't do it. They're -- they're told not to  
6 do that. You have -- over at Cleveland V. Sue --  
7 at any of the schools I oversee, my guys are told  
8 they will not conduct a search unless requested by  
9 an administrator.

10 **Q. Okay. Is that -- how is that**  
11 **communicated to them?**

12 A. I -- I tell them or I send it through an  
13 e-mail, possibly. And they're also told once  
14 they're hired.

15 **Q. Okay. Is that -- would you consider**  
16 **that to be a school policy?**

17 A. Yes.

18 **Q. Okay. And --**

19 A. Or formality.

20 **Q. Another way to describe it would be a**  
21 **practice or a custom. That's how business is done**  
22 **according to you; no search unless an**  
23 **administrator tells you to search?**

24 A. Yes.

25 **Q. Okay. Why is that the case?**

Page 25

1 A. Because an administrator is -- he --  
2 he's the authority that can ask, request for a  
3 search to be done.

4 **Q. All right. Security guards, on their**  
5 **own, can't decide to search someone?**

6 A. No.

7 **Q. All right. How -- how did you come to**  
8 **doing business like this at your high school?**

9 A. It's the way it has been since I -- I  
10 started there.

11 **Q. Since you started, okay. If you found**  
12 **out that a guard was doing searches without being**  
13 **directed to by administration, how would that be**  
14 **dealt with by you?**

15 A. I would -- it would be immediately  
16 investigated.

17 **Q. How serious of a violation of policy is**  
18 **that, in your mind, if it were to happen?**

19 A. Well, I mean, we -- you don't -- how  
20 serious? You just don't -- you don't put hands  
21 on -- on a kid unless you're requested and also  
22 the kid gives you permission to conduct a search.

23 **Q. Okay. You -- you mentioned students**  
24 **giving permission to conduct a search.**

25 A. Yeah, if a --

7 (Pages 22 to 25)

Page 30

1 A. Yes.  
 2 **Q. Do you guys ever use wands --**  
 3 A. We have.  
 4 **Q. -- during searches? All right. When**  
 5 **are those used?**  
 6 A. What? Excuse me.  
 7 **Q. When are those used?**  
 8 A. Usually we'll use those if they feel  
 9 that they might be concealing that they can't pat.  
 10 **Q. What do you mean?**  
 11 A. My guys have taken students up to the  
 12 front before and as they're on their way,  
 13 they'll -- they'll see a kid put something into  
 14 their pants and knowing that security can't pat  
 15 them there.  
 16 **Q. Okay. Why can't they pat them in their**  
 17 **pants?**  
 18 A. That's -- we're not trained to search  
 19 that part of their body.  
 20 **Q. And by "that part of their body," you're**  
 21 **referring to the groin, to the genital area?**  
 22 A. Yes.  
 23 **Q. Okay. So during this pat-down search,**  
 24 **there shouldn't be even incidental contact with a**  
 25 **student's genitals?**

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1 A. Yeah, no. They're trained to just pat  
 2 the pockets.  
 3 **Q. Okay. And are there any circumstances**  
 4 **in which it would be acceptable for a security**  
 5 **guard to intentionally touch a student's genitals**  
 6 **during a search?**  
 7 A. No, that's not the way they're trained.  
 8 **Q. Okay. And you'd agreed with me that**  
 9 **would be wrong?**  
 10 A. If it was to happen, yes.  
 11 **Q. Yeah. You'd agree with me that could**  
 12 **cause a student to suffer emotional harm and feel**  
 13 **bad about themselves?**  
 14 A. I -- I've never -- it's never been  
 15 reported to me anything like that has ever  
 16 happened so I wouldn't know what they're feeling  
 17 would be.  
 18 **Q. Okay.**  
 19 MR. BULLION: So we're not -- we're not  
 20 video recording this, right?  
 21 THE COURT REPORTER: We are recording  
 22 the audio.  
 23 MR. BULLION: Yeah. So I sometimes, you  
 24 know, when you make gestures, it gets kind of lost  
 25 in translation in the transcript. Would -- would

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1 you mind standing up and just showing me, you  
 2 know, because you -- you've patted your body a  
 3 couple of times. Would you mind doing that again  
 4 and describing for the court reporter each part of  
 5 your body that you're -- that you're actually  
 6 patting?  
 7 A. Yeah. Basically, you have them stand  
 8 up, they spread their arms. You come around here.  
 9 You pat here, here, go around the waistline, pat  
 10 here, here, and go down the legs, and have them  
 11 remove their shoes.  
 12 **Q. Okay. So I saw you touch the outside of**  
 13 **your hips, the outsides of your pockets.**  
 14 A. This is the waistline.  
 15 **Q. The waistline.**  
 16 A. The pock -- the outside pockets, the  
 17 pockets, and then down.  
 18 **Q. All right. So you're not touching the**  
 19 **student's buttocks?**  
 20 A. Just the pockets.  
 21 **Q. Okay. And do you use the palm of your**  
 22 **hand or the back of your hand?**  
 23 A. I would use the palm of my hand.  
 24 **Q. Okay. And when I -- you can sit down.**  
 25 **Thank you. When I saw you doing that I -- I**

Page 33

1 **noticed you did not get anywhere near the groin**  
 2 **area.**  
 3 A. True.  
 4 **Q. All right. And the way you demonstrated**  
 5 **that for me, is that the same that your security**  
 6 **guards are taught to do a search? Do you do a**  
 7 **similar demonstration for them at the start of the**  
 8 **year?**  
 9 A. Yes.  
 10 **Q. Okay. And I noticed you didn't -- you**  
 11 **didn't pat the inner -- upper inner thigh of your**  
 12 **leg either.**  
 13 A. True.  
 14 **Q. Is that another area that security**  
 15 **guards should not touch when doing a pat-down**  
 16 **search at your school?**  
 17 A. Well, they're not trained to touch.  
 18 **Q. Okay. Has -- have you ever had a**  
 19 **security guard say, "Hey, boss, you know, can I**  
 20 **pat-down like the groin or inner thigh area?"**  
 21 A. Never.  
 22 **Q. If someone were to say that to you, how**  
 23 **would you react?**  
 24 A. That's not in our policy and we're going  
 25 to stay away from that area.

9 (Pages 30 to 33)

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1 **children? They're getting in trouble a lot?**

2 A. On a year-to-year basis, you run into,  
3 you know, some of them that are causing problems.

4 **Q. Okay.**

5 A. That's how you learn of them. The  
6 majority of the kids get through and --

7 **Q. Yeah. I -- I don't want you to name**  
8 **names, but if I were to ask you for like the top**  
9 **three or five, you know, people who get referrals,**  
10 **you could tell me who they are right now, right?**

11 A. No.

12 **Q. No?**

13 A. Not me. My officers probably could  
14 because they're dealing with it more.

15 **Q. Okay. As far as you're aware, were**  
16 **either D.M., E.M, or J.S. frequently getting into**  
17 **trouble?**

18 A. Not that I know of.

19 **Q. I think we're about done. Let me -- let**  
20 **take five minutes and make sure I'm not forgetting**  
21 **--**

22 A. Okay.

23 **Q. -- anything. And I would hate to bug**  
24 **you again.**

25 THE WITNESS: Okay.

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1 other one, too? Do you -- do you have the other  
2 one?

3 THE COURT REPORTER: Yes, I do. Sorry.

4 MR. QUINONES: And what are the exhibit  
5 numbers on these, Counsel?

6 MR. WALZ: They're -- they're one and  
7 two. Okay? One and two.

8 MR. QUINONES: Thank you.

9 MR. WALZ: Okay.

10 **Q. (By Mr. Walz) Now, when you were asked**  
11 **about searches, do you recall that line of**  
12 **questioning when you could do a pat-down or not?**

13 A. Yes.

14 **Q. All right. Now, the first -- the first**  
15 **policy Counsel showed you is Exhibit 1, and that's**  
16 **RRPS Defendant 000206 and it's Policy 1009. Would**  
17 **you -- would you take a minute real quick to take**  
18 **a look at that? Just tell me when you're done**  
19 **there.**

20 A. Okay.

21 **Q. All right. Now you just reviewed that**  
22 **searches and seizures policy, correct?**

23 A. Yes.

24 **Q. Did you see anything in Policy 1009 that**  
25 **said that pat-down searches can only be utilized**

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1 MR. WALZ: Okay.

2 (Recess taken at 2:11 to 2:38 p.m.)

3 **Q. (By Mr. Bullion) Sir, you ever heard of**  
4 **any complaints being made against Mr. Archuleta?**

5 A. No.

6 **Q. No? Have you ever heard of complaints**  
7 **made against any of your security officers during**  
8 **your ten years as supervisor?**

9 A. From students?

10 **Q. Yes.**

11 **A. No.**

12 **Q. No?**

13 I don't have any further questions for  
14 you. Thank you.

15 MR. WALZ: Carlos?

16 MR. QUINONES: Yeah, I have no questions  
17 for Mr. Mangin.

18 MR. WALZ: You -- you know, I think I  
19 just have a couple.

20 EXAMINATION

21 BY MR. WALZ:

22 **Q. Counsel showed you a couple of board**  
23 **policies. Do you recall that?**

24 A. Yes.

25 MR. WALZ: Will -- will you hand me the

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1 **while searching for a weapon?**

2 A. No.

3 **Q. What is your interpretation and belief**  
4 **of when you can do pat-down searches pursuant to**  
5 **Policy 1009?**

6 A. When a search is requested to -- to  
7 search a person.

8 **Q. To look for what?**

9 A. Contraband.

10 **Q. Okay. And I think that Counsel had you**  
11 **define contraband, but to follow-up on Counsel's**  
12 **question, would a vape pen be considered**  
13 **contraband?**

14 A. Yes.

15 **Q. Assuming that there was reasonable**  
16 **suspicion to believe that the student had placed a**  
17 **vape pen in his waistband -- do you follow my**  
18 **hypothetical so far?**

19 A. Yes.

20 **Q. How would you search for that?**

21 A. You pat the waistband around the waist,  
22 and if you feel the object, you ask them to remove  
23 it.

24 **Q. Okay. So again pursuant to this Policy**  
25 **1009, in -- in your belief, that would be**

14 (Pages 50 to 53)



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1 **Q.** Okay. So that's -- that carves out an  
2 exception where school personnel themselves can  
3 conduct if reasonable suspicion exists, where  
4 security personnel are authorized to conduct a  
5 pat-down search for safety reasons; is that  
6 correct?

7 A. Yes.

8 **Q.** Okay. Then as we go through the search  
9 procedures, and I believe that this was read to  
10 you this morning or perhaps in the first  
11 deposition, it-- it tells what procedures are to  
12 be used in connection with this section, okay. I  
13 want you to focus though where it says, "pat-down  
14 searches." Will you read number six, the  
15 preliminary paragraph?

16 A. "Pat-Down Searches. A 'pat-down'  
17 consists of feeling the outer clothing for an  
18 object or item that could be a weapon. Factors to  
19 consider when determining the possession of a  
20 weapon are..."

21 **Q.** Okay. Now, when -- wehn we read that  
22 definitional section, does it reference back, in  
23 your opinion, to 3 B where it's giving security  
24 personnel authorization to conduct a pat-down  
25 search for a student in possession of a weapon for

Page 75

1 safety reasons?

2 A. Yes.

3 **Q.** Okay. So there's no limitation is there  
4 that you can see in this policy Exhibit 2? Or in  
5 Exhibit 1 that somehow hinders, prohibits the  
6 ability or authority based on reasonable suspicion  
7 for an administrator at the direction of school  
8 officials to request, if reasonable suspicion  
9 exists, a pat-down search even if you're not  
10 looking for a weapon? You're just looking for  
11 contraband. Can you do that?

12 A. Can you do a pat-down search?

13 **Q.** Yes.

14 A. If you're not looking for a weapon?

15 **Q.** Yes. If authorized or requested by a  
16 school authority.

17 A. If requested, yes.

18 **Q.** Okay. Thank you.

19 **To your knowledge, have -- has any**  
20 **lawsuit ever been brought against you or any of**  
21 **the -- Mr. Archuleta for alleged violation of**  
22 **illegal searches?**

23 A. No.

24 **Q.** And how many students have walked  
25 through the schools that you -- that you have been

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1 security, a director, if you can even project that  
2 many students since the time you -- your  
3 employment began at Rio Rancho?

4 A. That I oversee the schools, I oversee  
5 approximately 8500 students so ...

6 **Q.** Is that each year?

7 A. That's each year.

8 **Q.** Okay. So can you even project how many  
9 students there have been?

10 A. Whatever 8500 times ten would be,  
11 80,500.

12 **Q.** If we had known that, we'd become  
13 doctors, right? No, we get it. It's a very large  
14 number, correct?

15 A. Yes.

16 **Q.** Okay. But you would agree that even in  
17 authorized pat-downs, it's impermissible to  
18 intentionally touch or fondle a student's  
19 genitalia?

20 A. Yes.

21 **Q.** I don't have any other questions.

22 MR. BULLION: I promise we'll eventually  
23 be done, maybe, but the last time I went back and  
24 forth in a depo like this -- oh, nevermind.

25 (Continue on to next page)

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1 FURTHER EXAMINATION

2 BY MR. BULLION:

3 **Q.** Sir, with -- I just want to clarify.

4 You testified earlier that pat-down searches  
5 should not be done absent an administrator telling  
6 the security guard do a pat-down search. Is that  
7 still your testimony?

8 A. Unless a weapon's involved.

9 **Q.** Unless a weapon's involved. Okay. So  
10 if an officer's looking for contraband like a vape  
11 pen, they would have to have direction from a  
12 school administrator to perform a pat-down search?

13 A. Yes.

14 **Q.** Okay. And -- actually, no, that's it.  
15 We're good. Thank you.

16 MR. WALZ: We're good. We'll read and  
17 sign.

18 I'm sorry, Mr. Quinones, do you have any  
19 questions?

20 MR. QUINONES: No, I have no questions  
21 for Mr. Mangin.

22 MR. WALZ: Thank you. We'll read and  
23 sign, please. Thank you, Madam court reporter.

24 Thank you, Counsel.

25 MR. BULLION: That means you'll get the

20 (Pages 74 to 77)